

1 Colin M. Thompson, Esq.
 2 Law Offices of Colin M. Thompson
 3 J.E. Tenorio Building
 4 PMB 917 Box 10001
 5 Saipan, Mariana Islands 96950
 6 Telephone: (670) 233-0777
 7 Facsimile: (670) 233-0776

Dec 22 2005
 For The Northern Mariana Islands
 By _____
 (Deputy Clerk)

Attorney for Plaintiff

IN THE DISTRICT COURT
 FOR THE
 NORTHERN MARIANA ISLANDS

YU SUK CHUNG,

Civil Action No. 04-00001

Plaintiffs,

DECLARATION OF COLIN M.
 THOMPSON IN SUPPORT OF
 MOTION FOR SANCTIONS

vs.

WOLRD CORPORATION
 A CNMI Corporation.

Date : FEB 16 2006
 Time : 8:30 A.M.
 Judge: Hon. Alex R. Munson

Defendants.

I, Colin M. Thompson, do declare that:

1. I am the attorney of record for Plaintiff, Yu Suk Chung in this case. I make this declaration based on my personal knowledge and I am competent to testify as to the matters set forth.

2. In Defendant's response to Plaintiff's First Set of Request for Admissions, Response No. 1, Defendant denied that they terminated Plaintiff's employment with World Corporation. Attached to this Declaration as an Exhibit "A" is a true and correct copy of Defendant's Response to Plaintiff's First Set of Request for Admission. At trial, Plaintiff proved that defendant breached an employment contract with the defendant and therefore proved that defendant terminated Plaintiff's employment.

1 3. In Defendant's response to Plaintiff's First Set of Request for Admissions, Request No.
2 3, Defendant denied that they hired Plaintiff. Attached to this Declaration as an Exhibit "A" is a true
3 and correct copy of Defendant's Response to Plaintiff's First Set of Request for Admission. At trial,
4 Plaintiff proved that defendant breached an employment contract with the defendant and therefore
5 proved that defendant hired Plaintiff.

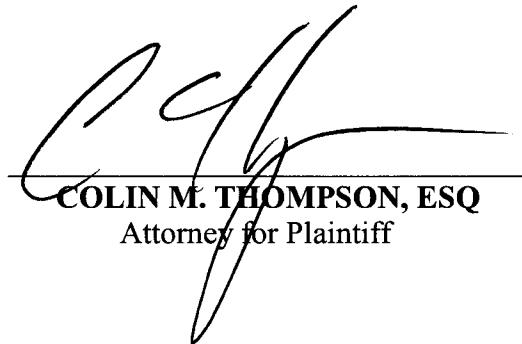
6 4. In Defendant's response to Defendant's Response to Plaintiff's First Set of Request for
7 Admissions, Request No. 4, Defendant denied that the Plaintiff was employed by World Corporation.
8 Attached to this Declaration as an Exhibit "A" is a true and correct copy of Defendant's Response to
9 Plaintiff's First Set of Request for Admission. At trial, Plaintiff proved that defendant breached an
10 employment contract with the defendant and therefore proved that the Plaintiff was employed by
11 World Corporation.

13 5. In Defendant's response to Plaintiff's First Set of Request for Admissions, Request No. 5,
14 Defendant denied that World Corporation made payments to Plaintiff in exchange for his service.
15 Attached to this Declaration as an Exhibit "A" is a true and correct copy of Defendant's Response to
16 Plaintiff's First Set of Request for Admission. At trial, Plaintiff proved that defendant breached an
17 employment contract with the defendant and therefore proved that World Corporation made payments
18 to Plaintiff in exchange of his service.

19 6. In Defendant's response to Plaintiff's First Set of Request for Admissions, Request No.
20 13, Defendant denied that Plaintiff entered into an employment contract. Attached to this Declaration
21 as an Exhibit "A" is a true and correct copy of Defendant's Response to Plaintiff's First Set of
22 Request for Admission. At trial, Plaintiff proved that defendant breached an employment contract
23 with the defendant and therefore proved that Plaintiff entered into an employment contract.

I declare by penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated this 21st day of December, 2005.



COLIN M. THOMPSON, ESQ
Attorney for Plaintiff

PEDRO M. ATALIG
Attorney at Law
Second Floor, V.S. Sablan Building
Chalan Piao
P.O. Box 5332
Saipan MP 96950
Telephone: (670) 234-2189
Facsimile: (670) 234-2191

MATTHEW T. GREGORY, ESQ.
Second Floor, V.S. Sablan Building
Chalan Piao
PMB 419, Box 10000
Saipan MP 96950
Telephone: (670) 234-3972
Facsimile: (670) 234-3973

Attorneys for World Corporation

UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

YU SUK CHUNG,) Civil Action No. 04-00001
Plaintiff,)
vs.)
WORLD CORPORATION,)
Defendant.)
DEFENDANT'S RE
PLAINTIFF'S FIF
REQUEST FOR A

**DEFENDANT'S RESPONSE TO
PLAINTIFF'S FIRST SET OF
REQUEST FOR ADMISSION**

Defendant responds to Plaintiff's First Set of Request for Admissions as follows:

Discovery is continuing. As such, these responses are given without prejudice to Plaintiff's right to produce evidence of any subsequently discovered fact(s) or document(s), and to otherwise assert factual and legal contentions as additional facts are ascertained and analyses are made legal research is completed.

Exh "A"

1 **RESPONSES**

2 **REQUEST NO. 1:** Admit that You terminated Plaintiffs employment with World Corporation.

4 **RESPONSE:** Denied.

6 **REQUEST NO. 2:** Admit that You refused and continue to refuse to provide employment to
7 plaintiff.

9 **RESPONSE:** Denied.

11 **REQUEST NO. 3:** Admit that You hired Plaintiff.

13 **RESPONSE:** Denied.

15 **REQUEST NO. 4:** Admit that Plaintiff was employed by World Corporation.

17 **RESPONSE:** Denied.

19 **REQUEST NO. 5:** Admit that World Corporation made payments to Plaintiff in exchange for his
20 service.

22 **RESPONSE:** Denied.

24 **REQUEST NO. 6:** Admit that Plaintiff was not employed by World Corporation.

1 **RESPONSE:** Admitted.

2

3 **REQUEST NO. 7:** Admit that Plaintiff was not employed by World Construction.

4

5 **RESPONSE:** Denied.

6

7 **REQUEST NO. 8:** Admit that Plaintiffs personnel file contains no record of discipline relating to
8 Plaintiff's performance of services for Word Corporation.

9

10 **RESPONSE:** Admitted.

11

12 **REQUEST NO. 9:** Admit that you were aware of the laws of the CNMI at the time you hired
13 Plaintiff.

14

15 **RESPONSE:** Objection. It is impossible to determine what laws are referred to. Therefore,
16 World Corporation can neither admit nor deny this admission.

17

18 **REQUEST NO. 10:** Admit that Plaintiff is no longer employed by World Corporation.

19

20 **RESPONSE:** Admitted that Plaintiff is not currently employed by World Corporation.

21

22 **REQUEST NO. 11:** Admit that Plaintiff has requested to return to his position of World
23 Corporation.

24

25 **RESPONSE:** Admitted that Plaintiff requested employment with World Corporation.

REQUEST NO. 12: Admit that You attempted to transfer Plaintiff from World Corporation to World Construction.

RESPONSE: Admitted that World Construction attempted to transfer Plaintiff to Korea.

REQUEST NO. 13: Admit that You entered into an employment contact with the Plaintiff.

RESPONSE: Denied.

REQUEST NO. 14: Admit that during the month of April 2003, You did not intend to provide Plaintiff with three years of employment with World Corporation.

RESPONSE: Objection. Defendant can neither admit nor deny this request. World Corporation or its parent company World Construction hoped that it could employ Plaintiff for many years. However, neither entity promises to provide 3 years of employment.

REQUEST NO. 15: Admit that you directed Plaintiff to go to Saipan to work for World Resort.

RESPONSE: Denied.

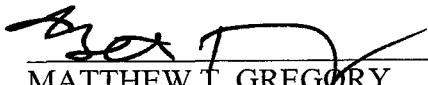
Dated this 20th day of July, 2004.

PEDRO M. ATALIG
MATTHEW T. GREGORY
Attorneys for Defendant

1 **CERTIFICATE OF SERVICE**
2
3
4
5
6
7

I certify that a true and correct copy of the foregoing DEFENDANT'S RESPONSE TO
PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS was by me or at my direction
served on 28 July, 2004 via facsimile and hand delivery to:

Colin M. Thompson
Attorney at Law
Lower Base
P.O. Box 501280
Saipan, MP 96950

12 
13 MATTHEW T. GREGORY
14
15
16
17
18
19
20
21
22
23
24
25